

STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft Louisiana Pollutant Discharge Elimination System Permit No. LA0104043; AI 52471; PER19980002 to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

I. THE APPLICANT IS: City of Winnfield
City of Winnfield Compaction Station
P.O. Box 509
Winnfield, LA 71483

II. PREPARED BY: Angela Marse

DATE PREPARED: February 24, 2006

III. PERMIT ACTION: LPDES permit LA0104043, AI 52471; PER19980002

LPDES application received: November 12, 1997
LPDES draft permit issued: October 1, 1999

IV. FACILITY INFORMATION:

A. The application is for the discharge of treated washdown water, treated wastewater from collection boxes ("leachate"), and treated contact stormwater. The facility compacts and transfers municipal garbage from the City of Winnfield to the LaSalle/Grant Parish Landfill. The facility (approximately 0.23 acres) is paved.

B. The permit application does not indicate the receipt of industrial wastewater.

C. The facility is located approximately 1.2 miles south of the City limits, on the east side of US. Hwy. 167 in Winnfield, Winn Parish.

D. The treatment facility consists of a catch basin, followed by three refurbished tanks for separation of solids, followed by an aerated package plant.

E. Outfall 001

Discharge Location: Latitude 31° 54' 29" North
Longitude 92° 36' 46" West

Description: treated washdown water, treated wastewater from collection boxes, and treated contact stormwater

Design Capacity: 0.001 MGD

Type of Flow Measurement which the facility is currently using: rainfall is measured with a rain gauge and the quantity is calculated using the area of coverage. A water meter on the supply line measures the washdown water.

V. RECEIVING WATERS:

The discharge is into an unnamed drainage ditch, thence into Creosote Branch, thence into the Dugdemona River in segment 081402 of the Ouachita River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 081402 of the Ouachita River Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Full	Full	Full	N/A	N/A	N/A	N/A

^{1/}The designated uses and degree of support for Segment 081402 of the Ouachita River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

Section 303(d) of the Clean Water Act as amended by the Water Quality Act of 1987, and EPA's regulations at 40CFR 130 require that each state identify those waters within its boundaries not meeting water quality standards. Section 303(d) further required that states develop management plans (Total Maximum Daily Load Studies, or TMDLs) for waterbodies determined to be water quality limited. Segment 081402 is not listed on the LDEQ 2004 303(d) List of impaired waterbodies. It currently meets water quality standards and fulfills designated uses as shown in the table above. Thus, no TMDLs are planned for this subsegment. However, a standard reopener paragraph is established in the permit to allow for additional requirements or more stringent effluent limitations imposed by any future water quality studies or new water quality standards.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 081402 of the Ouachita River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish & Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered species or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana State Historic Preservation Officer is required.

VIII.

PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mrs. Angela Marse
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX.

PROPOSED PERMIT LIMITS:

Final Effluent Limits:

OUTFALL 001

Several things were taken into account when determining the proposed effluent limitations. The original application for this facility was submitted in 1997. A priority pollutant scan submitted with the application indicated the low concentration of a few metals and toluene in the influent. A proposed permit was drafted for the facility in 1997. The draft permit contained permit effluent limits consistent with those issued to municipal solid waste landfills at the time. This was based on the similarity of wastestreams (wastewaters from domestic trash). Although both facilities do handle domestic trash, this station serves as a temporary staging facility before final disposal. Therefore, the amount of wastewater is significantly less in quantity. Permit effluent limits in the proposed permit are based on analytical data submitted with the application and the Multi-Sector General Permit for the most part. BOD, TSS, and fecal coliform limits are also limited in the permits. BOD and TSS limitations are required by the Effluent Limitations Guidelines, Pretreatment Standards, and New Source Performance Standards for the Landfills Point Source Category. Fecal coliform limitations are contained in all municipal solid waste landfill wastewater discharge permits. The inclusion of these parameters is appropriate since the wastestream (wastewater from collection boxes) is similar to that of municipal solid waste landfills.

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg.	Daily Max.	Basis
BOD ₅	---	45 mg/l	BPJ based on similar issued permit to similar facilities.
TSS	---	45 mg/l	BPJ based on similar issued permit to similar facilities.
TOC	---	50 mg/l	Multi-Sector General Permit, Sector P. Land Transportation and Warehousing.
Oil and Grease	---	15 mg/l	Multi-Sector General Permit, Sector P. Land Transportation and Warehousing.
Toluene	Report ug/l	Report ug/l	BPJ based on analytical data submitted with the application in 1997.
Priority Pollutants - Metals	Report ug/l	Report ug/l	BPJ based on analytical data submitted with the application in 1997.

*Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which express BOD₅ and TSS in terms of concentration.

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

A draft permit was written for the facility, but was not issued.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the no inspections have been performed for this facility.

B) Compliance and/or Administrative Orders

A review of the files indicates no enforcement actions administered against this facility.

C) DMR Review

There are no DMRs on file for this facility.

XII. ADDITIONAL INFORMATION:

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon water quality studies. These studies may indicate the need for **advanced** wastewater treatment. Studies of similar dischargers and receiving water bodies have resulted in monthly average effluent limitations of 5 mg/l CBOD₅, and 2 mg/l NH₃-N. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for facilities of flows between 0.001 and 0.004MGD.

<u>Effluent Characteristics</u>	<u>Monitoring Requirements</u>	
	<u>Measurement</u>	<u>Sample</u>
	<u>Frequency</u>	<u>Type</u>
Flow	1/3 months	Estimate
BOD ₅	1/3 months	Grab
TOC	1/3 months	Grab
Oil&grease	1/3 months	Grab
Priority Pollutant Metals	1/6 months	Grab
Toluene	1/6 months	Grab

Stormwater Pollution Prevention Plan

The permittee shall prepare, implement, and maintain a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit. The terms and conditions of the SWP3 shall be an enforceable Part of the permit. Any runoff leaving the developed areas of the facility, other than the permitted outfall(s), exceeding 50 mg/L TOC, 15 mg/L Oil and Grease, or having a pH less than 6.0 or greater than 9.0 standard units shall be a violation of this permit. Any discharge in excess of these limitations, which is attributable to offsite contamination, shall not be considered a violation of this permit. A visual inspection of the facility shall be conducted and a report made annually as described in Part II, Section B of the permit.

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in this Statement of Basis.

XIV REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8. "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5. "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, City of Winnfield, City of Winnfield Compaction Station, November 12, 1997.

Phone communication logs between Mrs. Kathy Tullos (City of Winnfield), Mr. Bill Kelly (City of Winnfield), and Mrs. Angela Marse (LDEQ) dated February 13, 2006, February 16, 2006, and February 24, 2006.